

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

| | |
|--|----------------------------------|
| DEBORAH CHIN, Individually and On Behalf) | Civil Action No. 04-CV-10294-DPW |
| of All Others Similarly Situated, |) |
| |) |
| Plaintiff, |) |
| |) |
| vs. |) |
| |) |
| SONUS NETWORKS, INC., et al., |) |
| |) |
| Defendants. |) |
| |) |
| <hr/> MICHELLE TREBITSCH, On Behalf of | Civil Action No. 04-CV-10307-DPW |
| Herself and All Others Similarly Situated, |) |
| |) |
| Plaintiff, |) |
| |) |
| vs. |) |
| |) |
| SONUS NETWORKS, INC., et al., |) |
| |) |
| Defendants. |) |
| |) |
| <hr/> |) |

[Caption continued on following page.]

AFFIDAVIT OF JOHN F. ROONEY, III IN SUPPORT OF GLOBAL UNDERVALUED
SECURITIES MASTER FUND'S CONSOLIDATED OPPOSITION TO COMPETING
MOTIONS FOR APPOINTMENT AS LEAD PLAINTIFF

| | | |
|---|---|----------------------------------|
| INFORMATION DYNAMICS, LLC, On |) | Civil Action No. 04-CV-10308-DPW |
| Behalf of Itself and All Others Similarly |) | |
| Situated, |) | <u>CLASS ACTION</u> |
| |) | |
| Plaintiff, |) | |
| |) | |
| vs. |) | |
| |) | |
| SONUS NETWORKS, INC., et al., |) | |
| |) | |
| Defendants. |) | |
| |) | |
| <hr/> PETER KALTMAN, On Behalf of Himself |) | Civil Action No. 04-CV-10309-DPW |
| and All Others Similarly Situated, |) | |
| |) | <u>CLASS ACTION</u> |
| Plaintiff, |) | |
| |) | |
| vs. |) | |
| |) | |
| SONUS NETWORKS, INC., et al., |) | |
| |) | |
| Defendants. |) | |
| |) | |
| <hr/> SAMANTHA DEN, Individually and On |) | Civil Action No. 04-CV-10310-DPW |
| Behalf of All Others Similarly Situated, |) | |
| |) | <u>CLASS ACTION</u> |
| Plaintiff, |) | |
| |) | |
| vs. |) | |
| |) | |
| SONUS NETWORKS, INC., et al., |) | |
| |) | |
| Defendants. |) | |
| |) | |
| <hr/> |) | |

[Caption continued on following page.]

| | | |
|--|---|----------------------------------|
| RICHARD CURTIS, Individually and On Behalf of All Others Similarly Situated, |) | Civil Action No. 04-CV-10314-MLW |
| |) | |
| Plaintiff, |) | <u>CLASS ACTION</u> |
| |) | |
| vs. |) | |
| |) | |
| SONUS NETWORKS, INC., et al., |) | |
| |) | |
| Defendants. |) | |
| |) | |
| <hr/> RONALD KASSOVER, On Behalf of the Ronald Kassover IRA and All Others Similarly Situated, |) | Civil Action No. 04-CV-10329-DPW |
| |) | |
| Plaintiff, |) | <u>CLASS ACTION</u> |
| |) | |
| vs. |) | |
| |) | |
| SONUS NETWORKS, INC., et al., |) | |
| |) | |
| Defendants. |) | |
| |) | |
| <hr/> STEVE L. BAKER, Individually and On Behalf of All Others Similarly Situated, |) | Civil Action No. 04-CV-10333-DPW |
| |) | |
| Plaintiff, |) | <u>CLASS ACTION</u> |
| |) | |
| vs. |) | |
| |) | |
| SONUS NETWORKS, INC., et al., |) | |
| |) | |
| Defendants. |) | |
| |) | |
| <hr/> |) | |

[Caption continued on following page.]

| | | |
|---|---|----------------------------------|
| MICHAEL KAFFEE, Individually and On Behalf of All Others Similarly Situated, |) | Civil Action No. 04-CV-10345-DPW |
| |) | |
| Plaintiff, |) | <u>CLASS ACTION</u> |
| |) | |
| vs. |) | |
| |) | |
| SONUS NETWORKS, INC., et al., |) | |
| |) | |
| Defendants. |) | |
| |) | |
| <hr/> HAIMING HU, Individually and On Behalf of All Others Similarly Situated, |) | Civil Action No. 04-CV-10346-DPW |
| |) | |
| Plaintiff, |) | <u>CLASS ACTION</u> |
| |) | |
| vs. |) | |
| |) | |
| SONUS NETWORKS, INC., et al., |) | |
| |) | |
| Defendants. |) | |
| |) | |
| <hr/> CHARLES STARBUCK, Individually and On Behalf of All Others Similarly Situated, |) | Civil Action No. 04-CV-10362-DPW |
| |) | |
| Plaintiff, |) | <u>CLASS ACTION</u> |
| |) | |
| vs. |) | |
| |) | |
| SONUS NETWORKS, INC., et al., |) | |
| |) | |
| Defendants. |) | |
| |) | |
| <hr/> |) | |

[Caption continued on following page.]

| | | |
|---|---|----------------------------------|
| SAMUEL HO, Individually and On Behalf of All Others Similarly Situated, |) | Civil Action No. 04-CV-10363-DPW |
| |) | |
| Plaintiff, |) | <u>CLASS ACTION</u> |
| |) | |
| vs. |) | |
| |) | |
| SONUS NETWORKS, INC., et al., |) | |
| |) | |
| Defendants. |) | |
| |) | |
| <hr/> | | |
| JEFFREY C. RODRIGUES, Individually and On Behalf of All Others Similarly Situated, |) | Civil Action No. 04-CV-10364-DPW |
| |) | |
| Plaintiff, |) | <u>CLASS ACTION</u> |
| |) | |
| vs. |) | |
| |) | |
| SONUS NETWORKS, INC., et al., |) | |
| |) | |
| Defendants. |) | |
| |) | |
| <hr/> | | |
| ROBERT CONTE and MARK RESPLER, Themselves and On Behalf of All Others Similarly Situated, |) | Civil Action No. 04-CV-10382-DPW |
| |) | |
| Plaintiffs, |) | <u>CLASS ACTION</u> |
| |) | |
| vs. |) | |
| |) | |
| SONUS NETWORKS, INC., et al., |) | |
| |) | |
| Defendants. |) | |
| |) | |
| <hr/> | | |

[Caption continued on following page.]

| | | |
|---|---|----------------------------------|
| WHEATON ELECTRICAL SERVICES |) | Civil Action No. 04-CV-10383-DPW |
| RETIREMENT 401K PROFIT SHARING |) | |
| PLAN, On Behalf of Itself and All Others |) | <u>CLASS ACTION</u> |
| Similarly Situated, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| vs. |) | |
| |) | |
| SONUS NETWORKS, INC., et al., |) | |
| |) | |
| Defendants. |) | |
| |) | |
| <hr/> BRIAN CLARK, Individually and On Behalf |) | Civil Action No. 04-CV-10454-DPW |
| of All Others Similarly Situated, |) | |
| |) | <u>CLASS ACTION</u> |
| Plaintiff, |) | |
| |) | |
| vs. |) | |
| |) | |
| SONUS NETWORKS, INC., et al., |) | |
| |) | |
| Defendants. |) | |
| |) | |
| <hr/> SHEILA BROWNELL, Individually and On |) | Civil Action No. 04-CV-10597-DPW |
| Behalf of All Others Similarly Situated, |) | |
| |) | <u>CLASS ACTION</u> |
| Plaintiff, |) | |
| |) | |
| vs. |) | |
| |) | |
| SONUS NETWORKS, INC., et al., |) | |
| |) | |
| Defendants. |) | |
| |) | |
| <hr/> |) | |

[Caption continued on following page.]

| | |
|--|----------------------------------|
| SAVERIO PUGLIESE, On Behalf of Himself) | Civil Action No. 04-CV-10612-DPW |
| and All Others Similarly Situated,) | |
| Plaintiff,) | <u>CLASS ACTION</u> |
| vs.) | |
| SONUS NETWORKS, INC., et al.,) | |
| Defendants.) | |
| <hr/> | |
| DAVID V. NOCITO, On Behalf of Himself) | Civil Action No. 04-CV-10623-DPW |
| and All Others Similarly Situated,) | |
| Plaintiff,) | <u>CLASS ACTION</u> |
| vs.) | |
| SONUS NETWORKS, INC., et al.,) | |
| Defendants.) | |
| <hr/> | |
| JONATHAN A. ZULAUF, On Behalf of) | Civil Action No. 04-CV-10714-DPW |
| Himself and All Others Similarly Situated,) | |
| Plaintiff,) | <u>CLASS ACTION</u> |
| vs.) | |
| SONUS NETWORKS, INC., et al.,) | |
| Defendants.) | |
| <hr/> | |

I, John F. Rooney, III, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of Massachusetts. I am a member of the law firm of Melick, Porter & Shea, LLP, proposed Liaison Counsel for plaintiff in the above-entitled action. I make this Affidavit in support of Global Undervalued Securities Master Fund's Consolidated Opposition to Competing Motions for Appointment as Lead Plaintiff. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached are true and correct copies of the following exhibits:

Exhibit A: Notice of Withdrawal of Motion by the Jiang Group for Consolidation, Appointment as Lead Plaintiff and for Approval of Selection of Lead Counsel, filed April 26, 2004;

Exhibit B: Notice of Withdrawal of Motion by Saverio Pugliese for Consolidation, Appointment as Lead Plaintiff, and for Approval of Choice of Lead Counsel, filed April 22, 2004;

Exhibit C: *Pierce v. Americredit Corp., et al.*, No. 4:03-CV-026-Y, Order (N.D. Tex. May 19, 2003);

Exhibit D: *Gradwell v. Pre-Paid, Legal Services, Inc., et al.*, No. CIV-01-182-C, Order (W.D. Okla. May 15, 2001);

Exhibit E: Brian Brus, *Plaintiff Drops Out of Pre-Paid Lawsuit Biggest Investor Sees No Merit in Continuing with Appeals*, Daily Oklahoman, Aug. 16, 2002; and

Exhibit F: *Weisz v. Calpine Corp., et al.*, No. C 02-1200 SBA, Order (N. D. Cal. Aug. 19, 2002).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 26th day of April, 2004, at Boston, Massachusetts.

/s/ John F. Rooney, III
JOHN F. ROONEY, III

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for each party by mail on 4/26/04 /s/ John F. Rooney, III
